cated a bankrupt. *Held,* that the referee may enjoin the creditors from all further proceedings in the State courts against the bankrupt.

The older decisions hold that the assignee must defend actions against the bankrupt in the court in which they were begun. *Eyster v. Gaff,* 91 U. S. 521. Since the Bankruptcy Act of 1898, the weight of authority is that such actions should be brought in the District court, but there is some doubt. *Bardes v. Hawarden Bank,* 178 U. S. 524, holds that controversies between the receiver and strangers should not be brought within the jurisdiction of the Federal courts without the consent of the strangers. Other decisions hold that the District court obtains jurisdiction over all property to which the adverse claim is merely colorable, and this seems the better rule. *Bryan v. Bernheimer,* 181 U. S. 188; *Mueller v. Nugent,* 22 Sup. Ct. 269.

BASTARDY—RESEMBLANCE OF CHILD TO DEFENDANT—INTRODUCTION OF CHILD IN EVIDENCE.—KELLY V. STATE, 32 So. 56 (ALA.).—*Held,* that a bastard child may be introduced in evidence, to show his resemblance to the defendant.

By the weight of authority, resemblance, as indicating that the defendant is the parent of the child, is admissible in evidence; and to establish it the child can be exhibited. *Finnegan v. Dugan,* 14 Allen 197; *Guant v. State,* 50 N. J. L. 490; *Whart., Ev.,* sec. 346. *Contra,* see *Reitz v. State,* 33 Ind. 187; *Keniston v. Rowe,* 16 Me. 38; *Hanawalt v. State,* 64 Wisc. 84; *Beck, Med. Jur.,* 615; although the reason assigned, the inconclusiveness of such evidence, is hardly satisfactory. In Iowa the age of the child determines the question. *State v. Smith,* 54 Iowa 104. In *State v. Britt,* 78 N. C. 479, the testimony of witnesses to the resemblance was permitted, but this is generally denied. *U. S. v. Collins,* 1 Cranch 592. But as to the analogous case of comparison of handwritings, see *Whart., Ev.,* sec. 708.

BOUNDARIES—LEGISLATIVE DETERMINATION—CONCLUSIVENESS ON COURTS. —CAMERON'S EX'RS V. STATE, 68 S. W. 508 (TEX.).—The legislature in 1833 granted lands to Greer County for school purposes. Subsequently the United States Supreme Court decided that Greer County was not, and never had been, a part of Texas. *Held,* that the action of the legislature in treating Greer County as a part of the State at the time the grant was made is still conclusive on the courts, and such school lands cannot be recovered from the grantee of the county on the ground that, as the county was never a part of the State the grant was void.

The court relied upon *Harrold v. Herington,* 64 Tex. 233, and cases cited therein. The decisions of the State courts which were quoted as authority for the proposition that the judicial department could not limit the jurisdiction asserted by the political department are cases in which the boundary had not been settled by the U. S. Supreme Court. *State v. Dunwell,* 3 R. I. 128; *Bedell v. Loomis,* 11 N. H. 15. In the following cases the controversy rose out of questions of national and not of State boundary. *Foster v. Neilson,* 2 Pet. 253; *U. S. v. Arredondo,* 6 Pet. 691. The court disregarded these distinctions. There is much authority on the other side of the question. It appears that the legislature never had jurisdiction over Greer County, hence all acts in relation thereto were void. *Norton v. Shelby,* 118 U. S. 434. Legislative authority of a State must spend its force within its territorial